UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WISCONSIN

> 18-26778 Case No.:

Judge: Susan V. Kelley

Chapter:

Chapter 13

In Re: Cheryl Denise Carter

OBJECTION TO MOTION OF US BANK TRUST N.A. FOR RELIEF FROM

AUTOMATIC STAY

The Debtor, through Geraci Law, LLC hereby submits this Objection to Motion of US Bank Trust N.A. for Relief From Automatic Stay, and in support thereof, alleges as

follows:

Debtor missed mortgage payments due to periods of unpaid sick leave. (1)

(2) Debtor is now back to work full-time and can resume her regular mortgage

payments.

(3) Debtor requests that she be allowed to make up any post-petition arrearage

by the filing of a supplemental claim to her Chapter 13 plan.

WHEREFORE, the Debtor requests that the Motion for Relief from Automatic

Stay filed by the Movant be denied and that the Court grant them a hearing on the matter.

Dated this Friday, December 07, 2018.

By: _/s/ Felicia Marie Petroff_

Felicia Marie Petroff Attorney of the Debtor

Bar #: 1066358

Felicia M. Petroff Geraci Law, LLC 2505 N. Mayfair Road, Suite 101 Wauwatosa, WI 53226 Phone: (312) 332-1800

Fax: (877) 247-1960 Email: wal@geracilaw.com

Rec. No: 788592

WD - MOT - Objection to MTMS with Cert of Service(bjb)

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CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Objection were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Friday, December 07, 2018:

Cheryl Carter 6083 N. 36th street Milwaukee, WI 53209

Additionally, the documents referenced above were also served via electronic means on the following individuals on Friday, December 07, 2018:

Rebecca R. Garcia PO Box 3170 Oshkosh, WI 54903 Marinosci Law Group, P.C. 134 N. LaSalle St., Suite 1900 Chicago, IL 60602

Dated this Friday, December 07, 2018.

By: /s/ Felicia Marie Petroff
Felicia Marie Petroff
Attorney of the Debtor
Bar #: 1066358

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